



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

RQ-2

Jackie Browning, Treasurer  
Teamsters Local 959 Alaska Labor  
Independent Voter Education  
P.O. Box 102092  
Anchorage, AK 99510

MAR 9 1994

Identification Number: C00039164

Reference: Year End Report (7/1/93-12/31/93)

Dear Ms. Browning:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR §102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §5441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR §102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the

contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Should you choose to refund or transfer-out the funds, the Commission will presume the funds were impermissible, absent a statement from your committee to the contrary. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 28 or 22 of the report covering the period during which they are made.

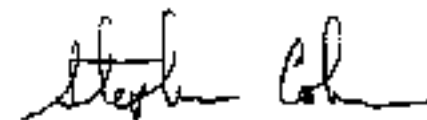
If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$9,129.99 in itemized contributions. The sum of the entries itemized on Schedule A, however, indicates the total to be \$10,154.99. Please amend your report to clarify the discrepancy.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Stephen Cohen  
Reports Analyst  
Reports Analysis Division

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 FOR LINE NUMBER 11 C

Information on this form is to be furnished only to the person or persons to whom it is addressed and is not to be distributed to other persons or to the public. It is the responsibility of the person or persons to whom it is addressed to ensure that it is not so distributed.

NAME OF CONTRIBUTOR (in full)

BRUNNEN LITH. CO. 1000 LEXINGTON AVE. NEW YORK, N.Y. 10017

A. Full Name, Mailing Address and ZIP Code Brunnen Lith. Co. 1000 Lexington Ave. New York, N.Y. 10017 Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> Secondary <input type="checkbox"/> Other (specify)	Name of Employer None Occupation Aggregate Year-to-Date > 1 3/2/54	Date (month, day, year) 03/24/54 04/24/54 05/24/54 06/24/54 07/24/54	Amount of Cash Received This Period 1.00 1.00 1.00 1.00 1.00
B. Full Name, Mailing Address and ZIP Code Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> Secondary <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > 1	Date (month, day, year)	Amount of Cash Received This Period
B. Full Name, Mailing Address and ZIP Code Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> Secondary <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > 1	Date (month, day, year)	Amount of Cash Received This Period
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B. Full Name, Mailing Address and ZIP Code Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> Secondary <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > 1	Date (month, day, year)	Amount of Cash Received This Period

TOTAL of Receipts This Page (optional)

SEND This Form (see page 111 for details)

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